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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\* \* \*

DAVID AGUILAR,

Plaintiffs,

V.

J. TAFELMEYER, et al.,

Defendant(s).

Case No.: 3:23-cv-00547-ART-CSD

**STIPULATION AND ORDER FOR  
EXTENSION OF DISCOVERY  
DEADLINES  
[Second Request]**

Plaintiff DAVID AGUILAR ("Plaintiff") and Defendants J. TAFELMEYER, et al. ("Defendant") (collectively, the "Parties"), by and through their respective counsel, hereby stipulate and agree that the discovery cut-off and related deadlines in this case be extended for a period of 60 days.

As detailed further herein, the additional time is necessary because the Plaintiff has sought leave to amend the complaint in this matter to add an additional party which Defendants are opposing, and the Defendants have very recently substituted in new counsel for this case. The parties believe an extension of the discovery period by

1 sixty days (60) will provide adequate time to complete discovery, and will permit  
2 potential Defendant NDOC to conduct discovery, if added as a party.

3 This is the second request for an extension of these deadlines. This request is  
4 made in good faith and is not for the purpose of delay. Pursuant to LR 26-4, the  
5 parties provide the following information to the Court in connection with their request  
6 for an extension of discovery deadlines:  
7

8 A. Statement of Discovery that has been Completed

9 The parties have each exchanged voluminous initial disclosures of documents  
10 and witnesses.  
11

12 B. Description of the Discovery that Remains to be Completed and the Reasons

13 The parties will likely need to issue requests for production, interrogatories, and  
14 requests for admission, and conduct depositions.

15 C. Proposed Schedule for Completing all Remaining Discovery

16 **Discovery Cut-Off Date:**

17 Existing Deadline: Wednesday, January 29, 2025

18 New Deadline: Monday, March 31, 2025 (adjusted from Saturday, March  
19 29, 2025)  
20

21 **Disclosures (Experts):**

22 Existing Deadline: Thursday, October 31, 2024

23 New Deadline: Tuesday, December 31, 2024 (adjusted from Sunday,  
24 December 29, 2024)  
25

26 **Disclosures regarding rebuttal experts:**

27 Existing Deadline: Monday, December 2, 2024  
28

1 New Deadline: Friday, January 31, 2025

2 **Dispositive Motions:**

3 Existing Deadline: Friday, February 28, 2025

4 New Deadline: Tuesday, April 29, 2025

5 **Joint Pretrial Order:**

6 Existing Deadline: Tuesday, April 1, 2025

7 New Deadline: Monday, June 2, 2025 (adjusted from Saturday, May 31,  
8 2025)

9 **Modification of discovery plan and scheduling order:**

10 Existing Deadline: Wednesday, January 8, 2025

11 New Deadline: Monday, March 10, 2025 (adjusted from Sunday, March 9,  
12 2025)

13 **IT IS SO STIPULATED.**

14 Dated: Oct 23, 2024

15 By: /s/ Mark Hackmann, Esq.  
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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: October 23, 2024